

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--------------------------------|---|-------------------------------|
| In re CHRISTOPHER J. MEANEY, |) | No. 07-12735 |
| |) | |
| Debtor. |) | Chapter 7 |
| |) | |
| |) | The Hon. Jack B. Schmetterer, |
| |) | Judge Presiding |
| |) | |
| |) | |
| MECKLER, BULGER & TILSON, LLP, |) | |
| Plaintiff |) | Adv. Proc. No. 07-1061 |
| |) | |
| v. |) | |
| |) | |
| CHRISTOPHER J. MEANEY |) | |
| Defendant |) | |

NOTICE OF MOTION

To: Christopher J. Meaney
25 Park Street
Saugatuck, MI 49453

PLEASE TAKE NOTICE that on the **27th day of January, 2009 at 10:00 a.m.** or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge Jack B. Schmetterer in the courtroom usually occupied by him in **Room 682** at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, and shall then and there present **Meckler Bulger & Tilson LLP's Motion to Set Pre-Trial Conference**, a copy of which has been previously served upon you.

MECKLER BULGER TILSON
MARICK & PEARSON LLP
123 North Wacker Drive, Suite 1800
Chicago, Illinois 60606
312-474-7900

I, the undersigned, certify that I served this notice by mailing a copy via regular mail to the attached service list at their respective addresses and depositing the same in the U.S. Mail at 123 North Wacker Drive, Chicago, Illinois 60606 before 5:00 p.m. on January 21, 2009 with proper postage prepaid.

/s/ Anne L. Blume
[X] Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--|---|-------------------------------|
| In re CHRISTOPHER J. MEANEY, |) | No. 07-12735 |
| |) | |
| Debtor. |) | Chapter 7 |
| |) | |
| |) | The Hon. Jack B. Schmetterer, |
| |) | Judge Presiding |
| <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/> | | |
| MECKLER, BULGER & TILSON, LLP, |) | |
| |) | |
| Plaintiff, |) | Adv. Proc. No. 07-1061 |
| |) | |
| v. |) | |
| |) | |
| CHRISTOPHER J. MEANEY |) | |
| |) | |
| Defendant |) | |

MOTION TO SET PRE-TRIAL SETTLEMENT CONFERENCE

Meckler Bulger & Tilson LLP n/k/a Meckler Bulger Tilson Marick & Pearson LLP (“MBT”) respectfully moves this Court to set a pre-trial settlement conference and in support states as follows:

1. On November 17, 2007, MBT filed an Adversary Complaint against debtor Christopher J. Meaney (“Debtor”) pursuant to Fed. R. Bankr. 7001 to prevent discharge of MBT’s judgment against Debtor pursuant to 11 U.S.C. § 727 and 11 U.S.C. § 523.
2. This matter is currently set for trial August 3 and August 4, 2009. (See Final Pretrial Order dated November 7, 2008 attached as Exhibit A).
3. There are no scheduled court status hearings prior to trial.
4. Since the last court appearance, the parties have discussed settlement and would benefit from guidance from the court through a pre-trial settlement conference.
5. The parties agree that a pre-trial conference would expedite and could assist in the resolution of this litigation.

WHEREFORE, Meckler Bulger & Tilson LLP respectfully moves this Court to set a pre-trial settlement conference date and providing such other and further relief as this Court deems just and proper.

MECKLER BULGER & TILSON LLP

By: /s Anne Blume
One of Its Attorneys

Anne L. Blume, Esq. (ARDC # 6206581)
MECKLER BULGER TILSON
MARICK & PEARSON LLP
123 N. Wacker Dr., Suite 1800
Chicago, Illinois 60606
(312) 474-7900
(312) 474-7898 (facsimile)
M:\10577\Bankruptcy\motion to set pre-trial.doc